

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

KRISTEN CREIGHTON,

Plaintiff,

V.

**HOOMAN KARAMIAN a/k/a
NIK RICHIE,
JAMES GRDINA, JOHN GRDINA,
FRANK DIMAGGIO, AND
DIRTY WORLD, LLC d/b/a
THEDIRTY.COM,**

Defendants.

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**CIVIL ACTION NO. 10-1725**

**JURY**

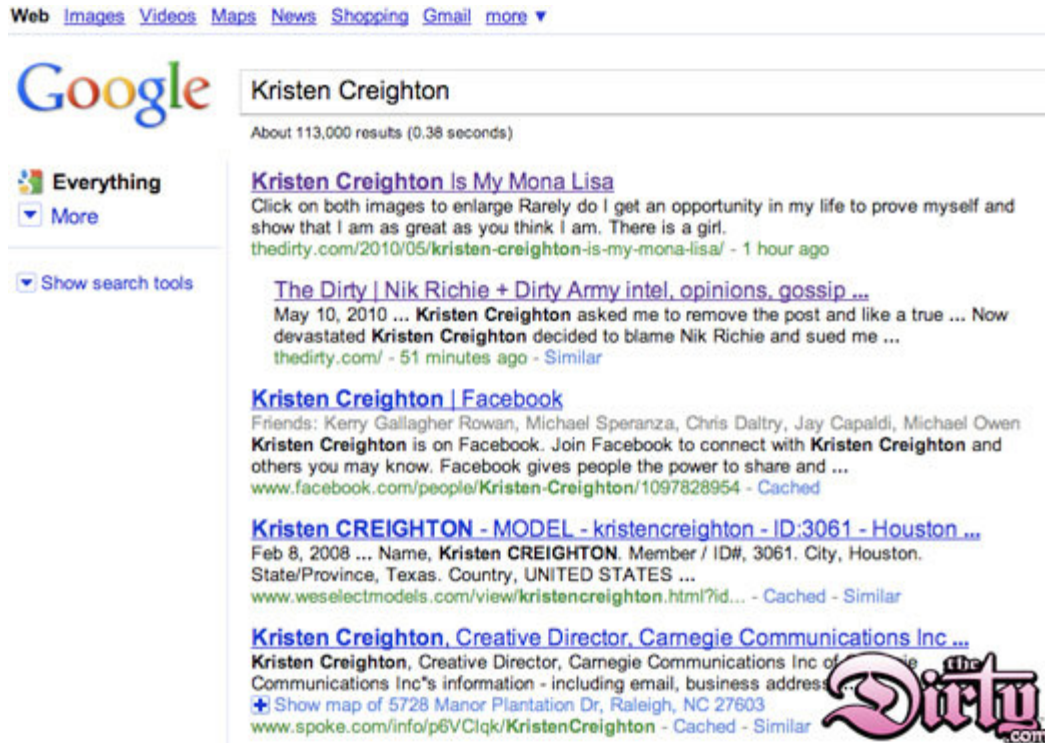
**PLAINTIFF'S EMERGENCY MOTION FOR EXPEDITED  
HEARING ON APPLICATION FOR RESTRAINING ORDER**

**TO THE HONORABLE JUDGE NANCY ATLAS:**

**Kristen Creighton** (hereinafter “Plaintiff” or “Creighton”) files this Emergency Motion for Expedited Hearing on Application for Restraining Order, seeking an expedited hearing.

### A. EMERGENCY MOTION

1. Defendant Hooman Karmaian a/k/a Nik Richie, the architect of the campaign against Plaintiff, was served with the Original Complaint on May 14, 2010. (See Proof of Service; Ex. A).
2. Since the filing of the Complaint, Defendant Nik Richie and Dirty World, LLC have refused to take down the postings about Plaintiff.
3. On page one and two of the Houston portion of [www.thedirty.com](http://www.thedirty.com), the highly invasive postings about Plaintiff continue:



**THE DIRTY ARMY:** Nik, I was watching your Kristen Creighton has herpes post to see how fast you could make her name infamous for having herpes and I just wanted to tell you it took 23 minutes. No amount of money is worth the wrath you can put on a persons life. You are the Godfather of the internet. I decided this time. Kristen you probably should have thought this through a bit.

(See Website; Ex. B).

4. Not only do the postings continue, but the person submitting this Google snapshot acknowledges the shear speed by which Defendants' postings were made available on Google—23 minutes. This person acknowledges, "No amount of money is wroth the wrath you can put on a persons life." *Id.*

5. In Defendant Nik Richie's own words there is more to come:

**DIRTY ARMY, I want you to be aware that I did not take down the Kristen Creighton posts for any type of legal reason. They are strictly in a holding pattern with much more to come. I think I proved my point to Kristen Creighton and hopefully she sees what her life can become overnight if this is the route she chooses. I had a heart back in 2009 when she asked me to remove her very first post and I am trying to have one now. The facts are the facts... Kristen Creighton has herpes and her lawyer Chris Bell lied to us on record about it.**

*Id.*

6. Because Defendants are emboldened by the “fight” they want to take to Plaintiff, they flaunt this litigation and the sanctity of due process. Irreparable harm is exacted upon Plaintiff each additional minute these postings continue.

7. Plaintiff requests this Court to grant an expedited hearing on her Application for Temporary Restraining Order, scheduling the hearing during the week of May 24, 2010.

Respectfully submitted,

By: /s/ Chris Bell

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that I forwarded a copy of this pleading to an individual who has represented that he is counsel for Defendants as follows on this 20<sup>th</sup> day of May 2010, addressed as follows:

David S. Gingras  
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/s/ Chris Bell \_\_\_\_\_  
Chris Bell